

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

Solutions in Hometown Connections, et al.,

Plaintiffs,

v.

Kristi Noem, et al.,

Defendants.

Civil Case No. 8:25-cv-885-LKG

**PLAINTIFFS' MOTION FOR TEMPORARY RESTRAINING ORDER, PRELIMINARY
INJUNCTION & APA § 705 STAY**

Under Federal Rule of Civil Procedure 65, and Section 705 of the Administrative Procedure Act, Plaintiffs Solutions in Hometown Connections, Central American Resource Center, Coalition for Humane Immigrant Rights, Community Center for Immigrants Inc., English Skills Learning Center, Michigan Organizing Project doing business as Michigan United, Hebrew Immigrant Aid Society and Council Migration Services of Philadelphia doing business as HIAS Pennsylvania, Immigrant Law Center of Minnesota, and Instituto del Progreso Latino move for a temporary restraining order, preliminary injunction, and stay of final agency action under 5 U.S.C. § 705 to prevent Defendants from causing further irreparable harm to Plaintiffs before the Court can consider the merits of this case. As set forth in the memorandum of law in support of this motion, Defendants' actions violate the Administrative Procedure Act.

Plaintiffs request that this Court grant preliminary relief to restore the funding that Defendants arbitrarily, capriciously, and unlawfully froze over a month ago. Since the freeze went into effect on February 4, 2025, Plaintiffs have scrambled to continue providing to their clients the citizenship

and naturalization services their grants supported. Some have already had to shrink their services and lay off staff, and others are quickly approaching the point where they will be unable to continue paying their bills without reducing services or staffing. Immediate relief is necessary so that Plaintiffs can continue to help their clients study and apply for naturalization as U.S. citizens, as their grants require.

March 25, 2025

Respectfully submitted,

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⁺*Application for full admission pending*

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^{**}*Motion to appear pro hac vice forthcoming*